

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**JUAN CASTANEDA-CHAVEZ**

:  
:  
:  
:  
:

**Case No: 5:23cr8**\_\_\_\_\_

**STATEMENT OF FACTS**

The parties stipulate that the allegations contained in the Superseding Indictment and the following facts are true and correct, and that had this matter gone to trial, the United States would have proven each of these facts beyond a reasonable doubt.

In the summer of 2022, law enforcement officers discovered that Juan CASTANEDA-CHAVEZ was a distributor of large amounts of methamphetamine and cocaine in the WDVA area. As part of their investigation, officers performed several controlled buys from CASTANEDA-CHAVEZ. For instance, on or about August 4, 2022, an undercover officer (UC) purchased 125.06 grams of cocaine from CASTANEDA-CHAVEZ in Stephens City, Virginia. During that controlled buy, CASTANEDA-CHAVEZ volunteered that he could also provide the UC with “meth,” which the UC understood as a shorthand reference to methamphetamine. Following the August 4 controlled buy, the UC performed three additional controlled buys from CASTANEDA-CHAVEZ on August 11, August 18, and October 7. During these controlled buys, CASTANEDA-CHAVEZ distributed to the UC, or caused to be distributed to the UC, about 441 grams, 408 grams, and 444 grams of methamphetamine, respectively.

As part of their investigation of CASTANEDA-CHAVEZ, law enforcement officers also obtained a court-ordered Title III wiretap on CASTANEDA-CHAVEZ’s primary cellphone. While intercepting CASTANEDA-CHAVEZ’s cellphone communications, law enforcement intercepted multiple communications between CASTANEDA-CHAVEZ and Promise’meh Zion Foreva (a/k/a “Solo”), Maria Castaneda-Chavez, Tonatiuh Garduno-Hernandez, Andy Binoya Miranda, Felix Garcia-Sanchez (“Chino”), Macario Correa-Castaneda, and others discussing the selling and distributing of narcotics; namely, methamphetamine and cocaine.

For example, during these intercepted communications, Foreva discussed picking up a “brick” from CASTANEDA-CHAVEZ and also delivering money to CASTANEDA-CHAVEZ. Miranda discussed buying a “whole chunk” of methamphetamine from CASTANEDA-CHAVEZ. Also, CASTANEDA-CHAVEZ instructed Garcia-Sanchez to break down a kilogram of cocaine into quarters and give it to another individual. CASTANEDA-CHAVEZ also discussed delivering a large amount of cocaine to Garduno-Hernandez. Finally, CASTANEDA-CHAVEZ had discussions with Correa-Castaneda regarding the delivery of large amounts of narcotics and money to their supplier.

Indeed, from around 2021 to March 2023, CASTANEDA-CHAVEZ sold kilogram quantities of cocaine and pound quantities of methamphetamine to various individuals in the WDVA. Specifically, from July 2022 to January 2023, CASTANEDA-CHAVEZ sold a half-kilogram of cocaine to Garduno-Hernandez on a regular basis.

With respect to Foreva, CASTANEDA-CHAVEZ distributed to Foreva about 125 grams of cocaine to a quarter kilogram of cocaine on a regular basis between April 2022 to October 2022. In October 2022, Castaneda-Chavez began supplying FOREVA with a half-kilogram of cocaine. Castaneda-Chavez would front the cocaine to FOREVA, who would pay for the cocaine a couple of days later. Castaneda-Chavez supplied FOREVA with cocaine every week or every other week until Castaneda-Chavez was arrested in March 2023.

With respect to Miranda, CASTANEDA-CHAVEZ supplied Miranda with three to four pounds of methamphetamine. Also, after CASTANEDA-CHAVEZ was arrested, CASTANEDA-CHAVEZ instructed Miranda to assist in the pickup and delivery of 5 kilograms of cocaine to Garcia-Sanchez.

With respect to Garcia-Sanchez, CASTANEDA-CHAVEZ sold Garcia-Sanchez about 20 kilograms of cocaine between August 2022 and March 2023.

With respect to Correa-Castaneda, Correa-Castaneda served as CASTANEDA-CHAVEZ's main source of supply of the cocaine that he distributed to other individuals. Both Correa-Castaneda and CASTANEDA-CHAVEZ worked together to bring in large quantities of cocaine to the EDVA and WDVA through a source in Mexico. For example, in August 2022, CASTANEDA-CHAVEZ picked up 10 kilograms of cocaine at truck stop and paid \$15,000 to the truck driver and the remaining portion of the funds to Correa-Castaneda. Finally, at the time CASTANEDA-CHAVEZ was arrested, he owed Correa-Castaneda about \$35,000 for cocaine the Correa-Castaneda fronted him. After CASTANEDA-CHAVEZ was arrested, Correa-Castaneda collected money that CASTANEDA-CHAVEZ owed from CASTANEDA-CHAVEZ's sister, Maria.

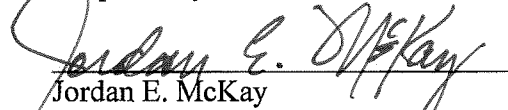
On March 6, 2023, while monitoring CASTANEDA-CHAVEZ's home, law enforcement officers observed CASTANEDA-CHAVEZ place what appeared to be a long firearm in the trunk of his car. Soon thereafter, officers arrested CASTANEDA-CHAVEZ and, in searching his vehicle, uncovered a High Point 9mm and Smith & Wesson .22 caliber rifle in CASTANEDA-CHAVEZ's vehicle. The firearms found in the vehicle belonged to CASTANEDA-CHAVEZ. Following CASTANEDA-CHAVEZ's arrest, law enforcement officers performed a consent search of Castaneda-Chavez's primary residence and discovered an owe sheet. The owe sheet contained a line entry with the following: "Solo - 18,000" and "Chino - 14,000." The "18,000" on the owe sheet referred to \$18,000 that Foreva owed CASTANEDA-CHAVEZ at the time CASTANEDA-CHAVEZ was arrested by police. The "14,000" on the owe sheet referred to \$14,000 that Garcia-Sanchez owed CASTANEDA-CHAVEZ at the time of his arrest.

CASTANEDA-CHAVEZ is an alien illegally and unlawfully in the United States and is aware of his immigration status.

CASTANEDA-CHAVEZ's actions occurred in the Western District of Virginia.

The actions taken by CASTANEDA-CHAVEZ as described above were taken willfully, knowingly, and with the specific intent to violate the law. CASTANEDA-CHAVEZ did not take those actions by accident, mistake, or with the belief that they did not violate the law. CASTANEDA-CHAVEZ acknowledges that the purpose of the foregoing statement of facts is to provide an independent factual basis for his guilty plea. It does not necessarily identify all the persons with whom CASTANEDA-CHAVEZ might have engaged in illegal activity or all the evidence that the United States would introduce at trial.

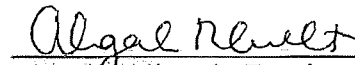
Respectfully submitted,

  
Jordan E. McKay  
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day, I stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
Juan Castaneda-Chavez, Defendant

I am Juan CASTANEDA-CHAVEZ's attorney. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

  
Abigail Thibeault, Esquire  
Counsel for Defendant